

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED
IN CLERKS OFFICE

2004 JUN -7 P 4: 45

U.S. DISTRICT COURT
DISTRICT OF MASS.

DIRECT REPORT CORPORATION d/b/a
SHAREHOLDER.COM,

Plaintiff,

v.

CCBN.COM, INC., THE THOMSON
CORPORATION, JOHN DOES 1
THROUGH 5, and JANE DOES 1
THROUGH 5,

Defendants.

Civil Action No. 04-10535 PBS

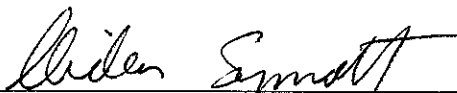
**DEFENDANTS CCBN.COM, INC. AND THE THOMSON
CORPORATION'S MOTION TO DISMISS PLAINTIFF'S
FIRST AMENDED COMPLAINT AND TO STAY DISCOVERY**

Defendants CCBN.com, Inc. and The Thomson Corporation (together, the "Defendants") hereby move pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure to dismiss, with prejudice, Counts 1-5 of the Amended Complaint filed by Direct Report Corporation, doing business as Shareholder.com, in this action. Defendants also move to dismiss the remaining Counts 6-10 of the Amended Complaint for lack of jurisdiction. Further, Defendants move to dismiss, with prejudice, the Amended Complaint, in its entirety, as to The Thomson Corporation. Lastly, Defendants move to stay discovery in this action pending the resolution of this Motion to Dismiss.

WHEREFORE, Defendants respectfully request that this Court dismiss, with prejudice, Plaintiff's Amended Complaint; and

WHEREFORE, Defendants respectfully request that this Court stay discovery in this action pending the resolution of this Motion to Dismiss.

Respectfully Submitted,



Aidan Synnott (*Pro Hac Vice*)
H. Seiji Newman (*Pro Hac Vice*)
Sunny S. Park (*Pro Hac Vice*)
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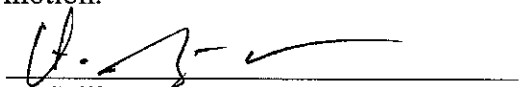
Anthony S. Fiotto (BBO # 558089)
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Attorneys for Defendants CCBN.com, Inc.
and The Thomson Corporation

Dated: June 4, 2004

LOCAL RULE 7.1(a)(2) CERTIFICATE

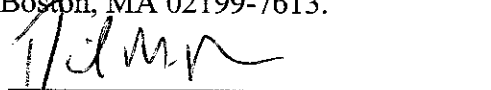
I, H. Seiji Newman, hereby certify that I have conferred with opposing counsel in good faith to resolve or narrow the issues raised in this foregoing motion.



H. Seiji Newman
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CERTIFICATE OF SERVICE

This is to certify that on this 7th day of June 2004, a true and correct copy of the above and foregoing instrument was served via hand delivery to Ruth T. Dowling, Esq., Palmer & Dodge LLP, 111 Huntington Avenue at Prudential Center, Boston, MA 02199-7613.



David M. Moss